

JP:MT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

TERRENCE BRADSHAW,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW D. DOYLE, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Immigration and Customs Enforcement, duly appointed according to law and acting as such.

Upon information and belief, on or about January 27, 2010, within the Eastern District of New York and elsewhere, defendant TERRENCE BRADSHAW did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about January 27, 2010, TERRENCE BRADSHAW arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Caribbean Airways Flight No. 522 from Port of Spain, Trinidad and Tobago.

2. Defendant TERRENCE BRADSHAW was selected for a routine Customs examination. A Customs and Border Protection ("CBP") officer conducted a routine inspection of the defendant's luggage. The defendant's checked luggage included a locked laptop portfolio briefcase. The CBP officer requested that the defendant open the laptop portfolio briefcase, which was found to be empty. Further inspection revealed that the walls of the laptop portfolio briefcase were packed with a white powdery substance, which field-tested positive for the presence of cocaine. Defendant TERRENCE BRADSHAW was then placed under arrest.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

3. The total approximate gross weight of the cocaine found in defendant TERRENCE BRADSHAW's suitcase is 993.4 grams.

WHEREFORE, your deponent respectfully requests that defendant TERRENCE BRADSHAW be dealt with according to law.



MATTHEW B. DOYLE
Special Agent
U.S. Immigration and Customs
Enforcement

Sworn to before me this
28rd day of January, 2010

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK